

# **EXHIBIT A**



## Paul D. Martin, Ph.D.

443.449.9006

[paul@harborlabs.com](mailto:paul@harborlabs.com)

1777 Reisterstown Road, East Bldg, Suite 230; Pikesville, MD 21208

### Profile

Dr. Martin is the Director of Firmware Security and a Senior Research Scientist at Harbor Labs. His research interests include embedded system security, operating system security, vulnerability analysis, reverse engineering, network protocol analysis, applied cryptography, cryptanalysis and privacy-preserving protocols.

### Education

<b>2011-2016</b>	<i>Ph.D. Computer Science, Johns Hopkins University, Baltimore, MD Securing Medical Devices and Protecting Patient Privacy in the Technological Age of Healthcare</i>
<b>2011-2013</b>	<i>M.S.E. Computer Science, Johns Hopkins University, Baltimore, MD</i>
<b>2007-2011</b>	<i>B.S. Computer Science, Johns Hopkins University, Baltimore, MD</i>

### Industry Experience

<b>2018-Present</b>	<i>Harbor Labs</i>	<b>Director of Firmware Security, Senior Research Scientist</b>
<b>2013-2018</b>	<i>Harbor Labs</i>	<b>Research Scientist</b>
<b>2011-2016</b>	<i>Johns Hopkins University Health and Medical Security Lab</i>	<b>PhD Candidate, Research Assistant</b>
<b>2013</b>	<i>Applied Communication Sciences</i>	<b>Graduate Intern</b>
<b>2011</b>	<i>(ICPSR) University of Michigan Inter-university Consortium for Political and Social Research</i>	<b>Penetration Tester</b>
<b>2009-2011</b>	<i>Independent Security Evaluators</i>	<b>Security Intern</b>
<b>2008-2010</b>	<i>(DRCC) Johns Hopkins University Digital Research and Curation Center</i>	<b>Student Programmer</b>
<b>2008</b>	<i>Brandeis University Hardware Repair Shop</i>	<b>Freelance Programmer</b>

### Teaching Experience

<b>2015</b>	<i>Introduction to Hardware Hacking</i>	<b>Instructor</b>
<b>2012-2014</b>	<i>Security and Privacy</i>	<b>Teaching Assistant</b>
<b>2011</b>	<i>Practical Cryptographic Systems</i>	<b>Course Assistant</b>

### Publications

P. Martin, D. Russel, M. Ben Salem, S. Checkoway, A. Rubin, Sentinel: Secure Mode Profiling and Enforcement for Embedded Systems, Proc. ACM/IEEE International Conference on Internet-of-Things Design and Implementation, (IoTDI '18).

P. Martin, M. Rushanan, T. Tantillo, C. Lehmann and A. Rubin, Applications of Secure Location Sensing in Healthcare. In the proceedings of ACM Conference of Bioinformatics, Computational Biology, and Health Informatics (BCB '16).



J. Carrigan, P. Martin, M. Rushanan, KBID: Kerberos Bracelet Identification. In the Proceedings of Financial Cryptography and Data Security (FC '16).

P. Martin, M. Rushanan, S. Checkoway, M. Green, A. Rubin. Classifying Network Protocol Implementation Versions: An OpenSSL Case Study. Technical Report 13-01, Johns Hopkins University (December 2013).

P. Martin, A. Rubin, and R. Bhatti, *Enforcing Minimum Necessary Access in Healthcare Through Integrated Audit and Access Control*. In ACM Conference on Bioinformatics, Computational Biology, and Biomedical Informatics Health Informatics Symposium (BCB-HIS), (September 2013)

## Patents

System and Method for automatically extracting information from binary files for use in Database Queries	<b>US 10,762,214 B1</b>
System and method for network traffic profiling and visualization	<b>US 9,667,521 B2</b>
System and method for network traffic profiling and visualization (Pending)	<b>US 15/606,717</b>
System and method for network traffic profiling and visualization (Pending)	<b>WO 2015113036A1</b>
Healthcare privacy breach prevention through integrated audit and access control	<b>US 8,984,583 B2</b>
Healthcare privacy breach prevention through integrated audit and access control	<b>US 9,438,632 B2</b>

## Current Research

Automated binary version extraction for NVD cross-reference based on fuzzy matching.  
Automated analysis of vulnerabilities in containers and virtual appliances.  
Large-scale comparison of nature and kind of firmware vulnerabilities across and within product classes.

## Expert Witness Engagements

### Class v. **Intuitive Surgical, Inc.**

Case:	Case # 3:21-cv-03496-VC
Description:	Litigation related to cryptographic security protections.
Services:	Technical analysis and expert reports on security and technical aspects of surgical devices.
Expert Testimony at Deposition:	Monrovia, MD (March 16, 2023)

### Healthcare Advanced Risk Technologies, Inc. and Inspirin Holdings Corp. v. **Terrence Mills, AI.io Corp., Jane Nemcova and VEUU, Inc.**

Case:	Case # 2:22-cv-04192-JS-AYS
Description:	Litigation related to timeline of software development and misappropriation of trade secrets.
Services:	Source code and documentation review, source code copying analysis, expert report drafting.

### **Communication Technologies, Inc.** v. Samsung Electronics America, Inc., and Samsung Electronics Co. Ltd.

Case:	Case # 2:21-cv-444-JRG
Description:	Litigation related to patents on secure erase processes.
Services:	Source code review of algorithms related to secure erase processes, declaration on aspects of source code review process and representativeness of source code

### Planck, LLC D/B/A Patch Media v. **Particle Media, Inc. D/B/A News Break, Et. Al.**



Case: Case # 20-cv-10959 (LGS)  
 Description: Litigation related to copyright.  
 Services: Review of web scraping facts, contracts and agreements and syndicated web feed technology, declaration on web scraping and syndicated web feed technology

**WSOU Investments, LLC D/B/A Brazos Licensing and Development v. Cisco, Inc.**

Case: Case # 6:21-cv-00128-ADA  
 Description: Litigation related to patents to patents on wireless network handoff, network management and authentication technologies.  
 Services: Source code review of accused products, declaration on aspects of source code review process.

**United States v. Laffon Ellis**

Case: Case # 2:19-cr-00369-DWA  
 Description: Analysis related to reliability of specific types of computerized DNA analysis in criminal proceedings.  
 Services: Source code review, expert report drafting.  
 Expert Testimony at Hearing: Monrovia, MD (December 20, 2021)

**Sysmex Corporation and Sysmex America, Inc. v. Beckman Coulter, Inc.**

Case: CA # 19-1642-RGA-CJB  
 Description: Litigation related to hematology analysis machine patents.  
 Services: Source code review. Expert report drafting.  
 Expert Testimony at Deposition: Monrovia, MD (November 22, 2021)

**CERTAIN ROUTERS, ACCESS POINTS, CONTROLLERS, NETWORKS MANAGEMENT DEVICES, OTHER NETWORKING PRODUCTS, AND HARWARE AND SOFTWARE COMPONENTS THEREOF**

Case: ITC Investigation No. 337-TA-1227  
 Description: ITC Investigation related to patents on wireless network handoff, network management and QoS technologies.  
 Services: Source code review, validity and prior art analysis, expert report drafting.  
 Expert Testimony at Trial: Washington, DC (July 28, 2021)  
 Expert Testimony at Deposition: Monrovia, MD (June 9-10, 2021)

**Micro Focus, Inc. v. Insurance Services Organization**

Case: DE Civil Action # 15-252-RGA  
 Description: Litigation related to unlicensed use of runtime environments, libraries and software compilers.  
 Services: Source code review. Binary reverse engineering and analysis, affidavit drafting, expert report drafting.  
 Expert Testimony at Deposition: Wilmington, DE (Feb 2, 2021)

**loanDepot.com, LLC v. Sigma Infosolutions, Inc.**

Case: AAA Case # 01-18-0001-5821  
 Description: Litigation related to software development practices.  
 Services: Source code analysis, experimentation, report drafting.  
 Expert Testimony at Deposition: Baltimore, MD (December 17, 2019)

**Cypress Lake Software, Inc. v. Samsung Electronics America and Dell, Inc.**

Case: Case # 6:18-cv-00030-RWS  
 Description: Litigation related to infringement of UX patents.  
 Services: Source code analysis, report drafting.  
 Expert Testimony at Deposition: Baltimore, MD (July 9, 2019)

**Apple, Inc. Device Performance Litigation**

Case: CA Civil Action # 18-md-02827-EJD



Description: Litigation related to business practices.  
 Services: Technical analysis and expert reports on security and technical aspects of mobile phone forensics.

**Italian Antitrust Authority v. Apple, Inc.**

Case: PS/11309  
 Description: Litigation related to business practices.  
 Services: Technical analysis and expert reports on security and technical aspects of software update processes.

**Carl Zeiss AG and ASML Netherlands B.V. v. Nikon**

Case: Case # 2:17-cv-07083-RGK (MRWx)  
 Description: Litigation related to patents on image detection algorithms.  
 Services: Source code review of algorithms related to image processing and detection algorithms, declaration on aspects of source code review process.

**Decision Resources, LLC v. Brigham Hyde, Precision Health Intelligence, LLC and Orr Inbar**

Case: MA Civil Action # 17-2834J  
 Description: Litigation related to timeline of software development and misappropriation of trade secrets.  
 Services: Source code and documentation review, development timeline analysis, affidavit drafting.

## Litigation Support

**Proxense, LLC. v. Samsung Electronics America, Inc., and Samsung Electronics**

Case: Case # 6:21-cv-00210-ADA  
 Description: Litigation related to patents on biometrics and payment processing.  
 Services: Source code review, documentation review, product testing, validity analysis, infringement analysis, report drafting.

**Global Eticket Exchange Ltd. vs. TicketMaster LLC**

Case: Case # 6:21-cv-00399-ADA  
 Description: Litigation related to patents on electronic ticketing.  
 Services: Source code review, documentation review, product testing, invalidity analysis, non-fringement analysis, report drafting.

**US Dominion, Inc. vs. Fox News Network**

Case: Case # N21C-03-257-EMD  
 Description: Litigation related to defamation and voting machine security.  
 Services: Source code review, documentation review, product testing, report drafting.

**Centripetal Networks, Inc. vs. Keysight Technologies, Inc.**

Case: Case # 2:22-cv-0002-AWA-DEM  
 Description: Litigation related to patents on network monitoring devices and security gateways.  
 Services: Source code review, documentation review, product testing, noninfringement analysis, infringement analysis.

**Milliman, Inc and Vigilytics LLC, vs. Gradient A.I. Corp.**

Case: Case # 1:21-cv-10865-NMG  
 Description: Litigation related to breach of contract and source code copying.  
 Services: Source code review, documentation review.



<b>WSOU Investments, LLC D/B/A Brazos Licensing and Development v. Microsoft Corporation</b>	
Case:	Case # 1:18- 6:20-cv-00464-ADA, 6:20-cv-00460-ADA, 6:20-cv-00457-ADA,
Description:	Litigation related to patents on telephony management systems and skill-based matchmaking.
Services:	Source code review, documentation review, validity analysis, infringement analysis, report drafting.
<b>10Tales Inc. v. TikTok PTE. Ltd.</b>	
Case:	Case # 1:18-cv-826-WCB
Description:	Litigation related to patents on user-adapted video streams.
Services:	Claim construction analysis.
<b>Carriere v. Symantec Corporation</b>	
Case:	Case # 500-06-000894-176
Description:	Class action litigation related to product security.
Services:	Source code review, documentation review, report drafting.
<b>IOENGINE, LLC v. Ingenico, Inc.</b>	
Case:	Case # 1:18-cv-826-WCB
Description:	Litigation related to patents on payment processing systems.
Services:	Source code review, documentation review, validity analysis, infringement analysis, report drafting.
<b>IOENGINE, LLC v. PayPal Holdings, Inc.</b>	
Case:	Case # 1:18-cv-452-WCB
Description:	Litigation related to patents on payment processing systems.
Services:	Source code review, documentation review, validity analysis, infringement analysis, report drafting.
<b>AGIS Software Development LLC v. Uber Technologies</b>	
Case:	Case # 2:21-cv-00026-JRG-RSP
Description:	Litigation related to patents on map overlays and messaging systems.
Services:	Source code review.
<b>Finjan v. Palo Alto Networks</b>	
Case:	Case # 4:14-CV-04908-PJH
Description:	Litigation related to patents on malware scanning gateways.
Services:	Invalidity analysis, Claim construction analysis, source code review.
<b>Huawei Technologies Co. v. Verizon Communications Inc.</b>	
Case:	Case # 6:20-CV-00090
Description:	Litigation related to patents on malware scanning gateways with cloud components.
Services:	Source code review, non-infringement analysis.
<b>Epic Games, Inc. vs. Apple, Inc.</b>	
Case:	Case # 4:20-cv-05640-YGR-TSH
Description:	Litigation related to business practices.
Services:	Document review, interviews, report drafting.
<b>Philips North America LLC ; Koninklijke Philips N.V. vs. Summit Imaging Inc.</b>	
Case:	Case # 2:19-cv-01745-JLR
Description:	Litigation related to third-party repair services.
Services:	Source code review, document review, report drafting.
<b>California Physicians Service, Inc D/B/A Blue Shield of California vs. Healthplan Services Inc,</b>	



Case:	Case # 3:18-cv-3730
Description:	Litigation related to software development practices and breach of contract.
Services:	Document review, source code review, report drafting.
<b>Finjan v. Qualys</b>	
Case:	Case # 4:18-cv-07229-YGR
Description:	Litigation related to patents on vulnerability assessment products.
Services:	Invalidity analysis, Non-infringement analysis, source code review, report drafting.
<b>Finjan v. Sonicwall</b>	
Case:	Case # 5:17-cv-04467-BLF-HRL
Description:	Litigation related to patents on malware scanning gateways.
Services:	Invalidity analysis, Non-infringement analysis, source code review, report drafting.
<b>TecSec Inc. v. Cisco and Oracle</b>	
Case:	Case # 1:10-cv-115 LO-TCB
Description:	Litigation related to patents on hardware accelerated cryptographic processors.
Services:	Infringement analysis, validity analysis, source code review, report drafting.
<b>Blackberry Limited v. Facebook, Inc.</b>	
Case:	Case # 2:18-cv-01844-KSx
Description:	Litigation related to patents on agent-based network monitoring, configuration and security systems.
Services:	Infringement analysis, validity analysis, source code review, report drafting.
<b>Uniloc, Inc. v. Big Fish Games, Inc.</b>	
Case:	Case # 2:16-cv-00741-JRG
Description:	Litigation related to patents on hardware cryptographic chips.
Services:	Non-infringement analysis, report drafting, source code review.
<b>SPEX Technologies, Inc. v. Toshiba America Electronic Components, Inc., et al.</b>	
Case:	Case # 8:16-cv-01800-JVS
Description:	Litigation related to patents on hardware cryptographic chips.
Services:	Non-infringement analysis, report drafting.
<b>Symantec Corporation v. Zscaler, Inc.</b>	
Case:	Case # 3:17-cv-04414-JST,
Description:	Litigation related to patents on security gateways, URL filtering and categorization
Services:	Infringement analysis, assignor estoppel, document review.
<b>Koninklijke Philips v. Microsoft Inc.</b>	
Case:	Case # 4:18-cv-01885-HSG,
Description:	Litigation related to patents on secure cryptographic protocols
Services:	Non-infringement analysis, validity analysis, claim construction analysis, document review, source code review.
<b>Netfuel, Inc. v. Cisco Systems, Inc.</b>	
Case:	Case # 5:18-cv-2352-EJD
Description:	Litigation related to patents on agent-based network monitoring, configuration and security systems.
Services:	Infringement analysis, claim construction analysis,



source code review, report drafting.

**Byrd et al. v. Aaron's, Inc., et al.**

Case: PA Civil Action # 1:11-cv-00101-SJM-SPB  
 Description: Class action litigation related to privacy.  
 Services: Attend depositions, source code review, report drafting.

**Finjan v. Juniper Networks**

Case: Case # 3:17-cv-05659-WHA  
 Description: Litigation related to patents on malware scanning gateways.  
 Services: Invalidity analysis, non-infringement analysis, source code review.

**Grace et al. v. Apple Inc.**

Case: Case # 5:17-cv-00551-LHK (NC)  
 Description: Litigation related to device performance and service outages.  
 Services: Mobile forensics and device analysis, report drafting, source code review, document review, technical analysis and argument construction.

**Rimini Street, Inc. v. Oracle International Corporation, et al.**

Case: Case # 2:14-cv-01699 LRH-CWH  
 Description: Litigation related to false claims on security.  
 Services: Large-scale testing of IPS techniques for including custom test infrastructure and implementation of techniques to block exploitation of vulnerabilities, technical analysis of vulnerabilities.

**Finjan v. Symantec Corporation**

Case: Case # 14-cv-02998-HSG  
 Description: Litigation related to patents on malware scanning gateways, endpoint protection and firewalls.  
 Services: Build and/or test software for Windows, invalidity argument strategy, non-infringement argument strategy, report preparation, source code reviews.

**Strikeforce, Inc. v. Entrust et al.**

Case: Case # 1:17-cv-00309  
 Description: Litigation related to patents on authentication technologies.  
 Services: Invalidity argument development, non-infringement argument development, report drafting.

**Sony Corporation, Inc. v. Arris**

Case: Inv. # 337-TA-1049  
 Description: Litigation related to patents on television streaming devices and/or services.  
 Services: Validity argument development, source code review of entire platform codebase including numerous embedded platforms, infringement argument development.

**Kudelski SA, Nagra USA, Inc., Nagravision SA, and OpenTV, Inc. v. Comcast Corporation**

Case: Case # 2:16-cv-1362-JRG, Inv. # 337-TA-1049  
 Description: Litigation related to patents on television streaming devices and/or services.  
 Services: Validity argument development, source code review of entire platform codebase including numerous embedded platforms, infringement argument development.

**Amazon.com Inc., Hulu, LLC, and Netflix, Inc. v. Uniloc Luxembourg S.A.**





Case: IPR 2017-00948  
 Description: Litigation related to patents on DRM protection for content distribution  
 Services: Prior art search, PGR Preparation, IPR preparation.

**PhishMe v. Wombat Technologies, Inc.**

Case: Case # 16-403-LPS-CJB  
 Description: Litigation related to patents on anti-phishing training technologies.  
 Services: Prior art search, PGR Preparation, IPR preparation.

**Nader Asghari-Kamrani and Kamran Asghari-Kamrani v. United States Automobile Association**

Case: Case # 2:15-cv-478  
 Description: Litigation related to patents on authentication technologies.  
 Services: Prior art search, invalidity argument strategy, non-infringement argument strategy, source code reviews

**Vir2us v. Invoicea Inc. and Invoicea Labs, LLC**

Case: Case # Case 2:15-cv-00162-HCM-LRL  
 Description: Litigation related to patents on virtualization and automated corruption repair.  
 Services: Prior art search, invalidity argument strategy, non-infringement argument strategy, source code reviews

**Palo Alto Networks v. Finjan**

Case: IPR 2016-00159, IPR 2016-00151, IPR 2015-01974, IPR 2015-02001, IPR 2015-01979  
 Description: Litigation related to patents on malware scanning gateways and firewalls,  
 Services: Prior art search, patent interpretation, IPR preparation support, claim chart review

**TVIIM v. McAfee**

Case: Case # 3:13-cv-04545-VC  
 Description: Litigation related to patents on vulnerability scanning  
 Services: Build and test software for SPARC/Linux/Windows, patch out license checks/crack software (with permission), obtain hard-to-find legacy software, prior art and non-infringement argument strategy support, source code reviews, prior art search

**Al Cioffi et al. v. Google**

Case: Case # 2:13-cv-103-JRG-RSP  
 Description: Litigation related to patents on browser sandboxing and process isolation.  
 Services: Code review/software testing to collect evidence of infringement, Infringement argument preparation support, claim chart review

**Rovi Solutions & Veracode v. Appthority**

Case: Case # 12-10487-DPW  
 Description: Litigation related to patents on static debugging tools  
 Services: Source code review refuting opposing expert testimony

## Analysis, Design and Development Clients

Arai

ICU Medical



Baxter	Inexto
Bigfoot Medical	Intuitive Surgical
BT Group	Merlin
Cardiac Sciences	Orpheus
Dyadic	Security First Corporation
Fresenius	Texas Instruments
HLFIP Holdings	Thesys
Hospira	Vaxxin

## Pre-Harbor Labs Security Design and Software Development Experience

### 2013 *At Applied Communication Sciences*

Role: Graduate Intern  
Technologies: JavaScript, Python, Tcpdump, Wireshark

- Developed extensible real-time traffic visualization tool to chart and analyze high-volume tcpdump streams of lossy metropolitan-area mesh network traffic.

### 2011 *At University of Michigan ICPSR*

Role: Penetration Tester  
Technologies: Numerous Security Tools, Amazon EC2, VMware VSphere

- Conducted wide-scale penetration testing on virtualized cloud-based systems meant to be secure environments for researchers to store confidential results
- Created formal threat model document detailing potential security vulnerabilities from all possible attack vectors
- Wrote two reports detailing results from penetration test

### 2009-2011 *At Independent Security Evaluators*

Role: Security Intern  
Technologies: C++, C#, Dalvik Bytecode, Gcov, GDB, Javascript, Peach Fuzzer, Python, RegEx, XML, Wireshark

- Created log parsing framework to analyze 20+ log file formats
- Assisted with malware testing, research and analysis
- Reverse engineered DRM schemes in Android and IOS applications
- Researched and prototyped secure cryptographic mail delivery system
- Developed web crawler to collect file sets for use in fuzzing
- Wrote code-coverage analysis tool for constructing minimum file set for fuzz testing
- Wrote fuzzing plugins using Peach Fuzzer framework and reverse engineered binary file specifications
- Wrote Internet Explorer and Chrome extensions for cryptographic proxy system
- Created and debugged network protocols for use in network protocol testing
- Wrote and debugged unit tests in C++ and Python for proprietary disk-encryption system

### 2008-2010 *At Johns Hopkins University DRCC*

Role: Student Programmer  
Technologies: DOM, Java EE, JSP Perl, SAX, XSLT

- Drafted a report detailing security recommendations for an NSF funded data conservancy project
- Set up and deployed a Fedora digital repository with the Islandora frontend
- Ported IRStats statistics package to the DSpace information repository XMLUI
- Wrote batch importer that is now used to import more than 20 digitized books a week into DSpace repository



**2008** *At Brandeis University Information Technology Services Hardware Repair Shop*  
 Role: Freelance Programming Consultant  
 Technologies: Java, Visual C++, VBScript

- Sole programmer on project to interface Request Tracker ticketing system with Brother PT- 9500PC Label Printer

## Technical Skills

<b>Languages</b>	BASH, C, C++, C#, HTML, Java, JavaScript, Objective-C, Python, Perl, PHP, Regular Expressions, SQL, XML
<b>Architectures</b>	6502, 8051, 8080, ARM Cortex-M, ARMv7, ARMv8, AVR, m68k, MIPS, MSP430, PIC, SPARC, PowerPC, x86, x86-64, Z80
<b>Operating Systems</b>	Android, ChromeOS, FreeBSD, iOS, OpenBSD, Linux, macOS, Windows
<b>DevOps and Development Tools</b>	Ansible, Ant, BitBucket, Confluence, Docker, gdb, git, GitHub, GitLab, Gradle, Hadoop, jad, jd-gui, Jira, Maven, make, MySQL, PostgreSQL, subversion, Trello, Vagrant, valgrind
<b>Security Tools</b>	Aircrack-ng, apktool, binwalk, bulk-extractor, Burp suite, Charles Proxy, curl, dex2jar, ftk, hashcat, IDA Pro, Metasploit, mitmproxy, Nessus, nmap, OpenSSL, ophcrack, p0f, Scalpel, skipfish, snort, sslstrip, sslyze, Volatility, Web Scarab, wget, Wireshark
<b>Cloud and Virtualization</b>	AWS, Azure, Bhyve, KVM, LXD, QEMU, virt-manager, VMware, Xhyve

## Honors, Societies and Awards

- Member Upsilon Pi Epsilon International Computer Science Honor Society
- Member Institute for Electrical and Electronics Engineers (#97507890)
- Member Association for Computing Machinery (#9700346)

### *At Johns Hopkins University*

- Computer Science Department Outstanding Teaching Assistant Award (2014)
- Treasurer, Upsilon Pi Epsilon International Computer Science Honor Society (JHU Chapter)
- Computer Science Department Faculty Liaison Czar
- Student Representative to the Computer Science Undergraduate Curriculum Planning Curriculum Committee

## Certifications

- Certified Six Sigma Green Belt
- Certified Six Sigma Black Belt